

**AFFIDAVIT OF SPECIAL AGENT JANET CONNOLLY IN SUPPORT OF  
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Janet Connolly, Special Agent with the Department of Homeland Security, Homeland Security Investigations, being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with United States Department of Homeland Security (“DHS”), Immigrations and Customs Enforcement, Homeland Security Investigations (“HSI”), and am assigned to the office of the Special Agent in Charge, Boston, MA. I have been an agent of HSI since 2008. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to child exploitation, child pornography, coercion and enticement, and transportation of minors, including but not limited to violations of 18 U.S.C. §§ 2422, 2423, 2251, 2252, and 2252A. I have received training in the investigation of child pornography, child exploitation, and transportation of minors, and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256). I have participated in the execution of numerous search warrants involving child exploitation and/or child pornography offenses.
2. I submit this affidavit in support of a criminal complaint charging Hanford CHIU, YOB 1990, of Brighton, Massachusetts, with one count of receipt of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A), and one count of possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).
3. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is probable cause to secure a criminal

complaint and does not set forth all of my knowledge about this matter. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

#### **STATEMENT OF PROBABLE CAUSE**

4. On August 22, 2018, at approximately 10:00 a.m., HSI agents executed a search warrant at Hanford CHIU's residence, the first-floor bedroom of 283 Market Street, Brighton, Massachusetts for evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A. CHIU was present and met agents at the front door to the premises. CHIU remained in another room of the apartment while agents executed the warrant in his bedroom.
5. In the course of the execution of the warrant, agents located and seized several devices, including a custom-built desktop computer, three removable storage (USB) drives, a laptop, a Samsung cell phone, an Apple iPhone, an Amazon Echo, and a tablet computer.
6. Agents were able to conduct an on-scene forensic preview of the desktop computer, which contained three hard drives: a Samsung SSD 830, a Seagate ST9750420AS, and a Samsung SSD 750. Agents determined that the desktop computer runs a version of the Microsoft Windows operating system and found it to contain a password-protected user account labeled as "Hanford." The desktop computer was connected to the Internet.
7. During the on-scene forensic preview of the desktop computer, agents observed files that they believed to contain child pornography. For example, on the Seagate hard drive found within the desktop computer, agents located a folder (accessed at file path: Downloads/103/New folder) that contained more than 1000 image files. Based on their on-scene review, agents believe that the majority of those images depict prepubescent children engaged in sexual conduct, some with other children and some with adults.
8. Examples of files that agents observed in that folder on the Seagate hard drive include:

- a. cp\_288.bmp: This image depicts a naked child, who appears to be approximately one to two years old, sitting next to a naked adult male who is holding his penis with his right hand. The child's head is angled toward the adult male's penis and the child's hand is resting on the adult male's hand that is holding his penis. The adult male has his other hand covering the child's genital area. This image was located at the file path: Downloads/103/New folder/mtrtwa/boylove superwow pics v1.<sup>1</sup>
- b. Imgsrcl Ru pthc Pedo Babyshivid Childlover Private Daughter Torpedo Ranchi Lolita - 40012826004505.jpg: This image depicts a baby lying on a blue and white striped towel, with an adult male apparently sitting or positioned on top of the baby. The adult's erect penis extends over the baby's stomach and chest, and the tip of the penis is inserted in the baby's mouth. The baby's left hand is touching the side of the man's penis. This file was located at the file path: Downloads/103/New folder/mtrtwa/boylove superwow pics v1.<sup>2</sup> The agents who viewed this file recognized it from previous investigations, and know that the child has been identified and that the image was produced overseas. Data accessible to agents during the forensic preview indicates the "last accessed" date of this file to be August 3, 2016.

9. Agents conducting the forensic preview also observed various artifacts of TOR<sup>3</sup> activity, including:

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<sup>1</sup> This image is available for the Court's review.

<sup>2</sup> This image is available for the Court's review.

<sup>3</sup> TOR, which is an acronym for "the onion router," is a computer network designed to facilitate anonymous communication over the internet by routing a user's communications through a globally distributed network of relay computers, or "nodes," which are also referred to as "onion routers." To access the TOR network, a user must install TOR software, which is free and publicly accessible.

- a. TorChat.exe, which is an instant messaging and file sharing program that uses the dark web<sup>4</sup> to communicate and transmit data between users.
- b. The TOR browser, which is a program used to access hidden services<sup>5</sup> on the dark web. The TOR browser directory is located in the desktop folder within the “Hanford” user account.
- c. Several “onion” URLs<sup>6</sup> that are indicative of hidden services accessed via the dark web.

### CONCLUSION

10. Based on all of the foregoing information, I submit that there is probable cause to believe that:
  - a. on various dates between approximately August 2016 and August 22, 2018, CHIU knowingly received any child pornography that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A); and

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<sup>4</sup> The “dark web” is a general term used to describe content that exists on networks that use the internet but require specific software, configurations, or authorization to access. The dark web includes networks such as TOR.

<sup>5</sup> Hidden services are websites that are accessible within the TOR network. I know, from my training and experience, that there are many hidden services that are dedicated to the exchange of child pornography.

<sup>6</sup> A URL is the address of a website accessible via the internet. As distinguished from standard internet websites, TOR hidden services are designated by web addresses that are comprised of a series of algorithm-generated characters, followed by the suffix .onion.

- b. on or about August 22, 2018, CHIU knowingly possessed any material that contained an image of child pornography that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B).

Sworn to under the pains and penalties of perjury,

  
Special Agent Janet Connolly  
Homeland Security Investigations

SUBSCRIBED and SWORN to before me on August 22, 2018.

  
HONORABLE DONALD L. CABELL  
UNITED STATES MAGISTRATE JUDGE



I have reviewed the images referenced in paragraph 10 above, and I find probable cause to believe that the image depicts minors engaged in sexually explicit conduct. The Affiant shall preserve said image for the duration of the pendency of this matter, including any relevant appeal process.

  
HONORABLE DONALD L. CABELL  
UNITED STATES MAGISTRATE JUDGE

